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6 UNITED STATES DISTRICT COURT
7 WESTERN DISTRICT OF WASHINGTON
8 AT SEATTLE

9 CLYDE STEPHEN LEWIS, JAMES PRESTI,
and MICHAEL RALLS, individual and on
behalf of all others similarly situated,

10 Plaintiffs,

11 v.

12 CF ARCIS VII LLC d/b/a THE CLUB AT
13 SNOQUALMIE RIDGE, d/b/a TPC AT
SNOQUALMIE RIDGE, and d/b/a
14 SNOQUALMIE RIDGE GOLF CLUB, et al.,

15 Defendants.

No. C17-1932 RSM

**STIPULATED MOTION AND
ORDER TO EXTEND CASE
DEADLINES**

16 Plaintiffs Clyde Stephen Lewis, James Presti, and Michael Ralls (“Plaintiffs”) and
17 Defendants CF Arcis VII LLC, CF Arcis IV Holdings, LLC, and Arcis Equity Partners, LLC
18 (the “Arcis Defendants”), by and through their counsel, jointly move to extend case deadlines.
19 In support of their motion, the parties assert the following:

20 1. On August 2, 2018, the Court granted in part and denied in part the Arcis
21 Defendants’ Motion to Dismiss. Dkt. 26.

22 2. On October 23, 2018, the Court entered a Rule 16(b) and Rule 23(d)(2)
23 Scheduling Order Regarding Class Certification Motion, establishing March 15, 2019 as the
24 deadline to complete discovery on class certification, and April 18, 2019 as the deadline for
25 Plaintiffs to file their motion for class certification (“Initial Scheduling Dates”). Dkt. 28.

26 3. In the months that followed, the parties have actively explored the possibility
27 that this matter may be amenable to resolution without further litigation. In the course of those

discussions, the parties exchanged certain discovery informally. Because of the number of parties involved, discussions took longer than anticipated.

4. Recently, the parties' discussions have shifted toward mediation. The parties are scheduled to attend mediation with Jim Smith of Smith & Hennessey PLLC on May 8th.

5. LCR 16(b)(4) governs the modification of scheduling orders, and provides that the dates and schedule specified in the Court's scheduling order may be modified for good cause and with the Court's consent.

6. The parties believe their respective resources are best directed toward discussing an agreed resolution of the case, which may obviate the need for formal discovery and motions practice. Should mediation fail, the parties are prepared to efficiently conduct and complete discovery. However, they would like to exhaust the possibility of resolving the case without further litigation before they do so.

7. The Court previously found that the parties had established good cause to extend the Initial Scheduling Dates by three months. The parties submit that good cause exists to extend the Initial Scheduling Dates by an additional three months so that the parties have sufficient time to complete their discussions.

8. For these reasons, the parties respectfully request that the Court modify the case deadlines, as follows:

EVENT	EXISTING DEADLINE	NEW DEADLINE
Deadline to complete discovery on class certification	Friday, June 14, 2019	Friday, September 13, 2019
Deadline for Plaintiffs to file their motion for class certification	Thursday, July 18, 2019	Thursday, October 17, 2019

1 RESPECTFULLY SUBMITTED and DATED this 16th day of January, 2019.

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20 **ORDER**

21 IT IS SO ORDERED this 19th day of April 2019.

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23 RICARDO S. MARTINEZ
24 CHIEF UNITED STATES DISTRICT JUDGE
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